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**From:** Jacqueline Ronstadt [Jacqueline.Ronstadt@pima.gov]  
**Sent:** 7/29/2020 6:25:27 PM  
**To:** Brahmbhatt, Roshni [brahmbhatt.Roshni@epa.gov]; Sims, Mark [Sims.Mark@epa.gov]  
**Subject:** Tucson Iron and Metal Update and Questions

Good Morning,

TI&M conducted a RATA test on July 21, 2020. I received a phone call from the stack testing company (Bison engineering) yesterday letting me know that TI&M had failed their RATA. During the phone call the manager mentioned that TI&M had good CEMS values, nearly identical to the testing companies in fact when looking at the raw numbers. The RATA failed once the 7% O<sub>2</sub> was calculated, resulting in a 37.4% difference. The allowable range is 10%. TI&M has recently shown that they are passing their calibration drift, cylinder gas audits and the raw CEMS comparison from the RATA stack test. Is there any guidance for a situation like this other than to retest and continue to consider the CEMS data to be out-of-control until a passing RATA is conducted? PDEQ was on site during the RATA on 7/21/20 and noted no emissions coming out of the front of the OSWI. Although in order to ensure no emissions were visible, the operator had to increase the blower speed and the O<sub>2</sub> draw through the system resulting in the cooling of the afterburner to 1200°F from the typical 1400°F. When we looked at the preliminary tests in the testing trailer it was apparent that TI&M was exceeding the CO compliance values.

PDEQ would also like to set up a follow-up meeting with the previous parties involved from the last meeting, including attorneys. Please let me know when everyone is available. I am happy to set up the meeting if that is easiest!

Thank you,

Jackie Ronstadt, Air Compliance Manager  
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